

# EXHIBIT B

**From:** [Kelly M. Donoho -DPSCS-](#)  
**To:** [Eve Hill](#)  
**Cc:** [Merrilyn E. Ratliff -DPSCS-](#); [dgolden@debgoldenlaw.com](mailto:dgolden@debgoldenlaw.com); [Jessie Weber](#); [Lauren A. DiMartino](#); [Sharon Krevor-Weisbaum](#)  
**Subject:** Re: Urgent - Chloe Grey  
**Date:** Wednesday, March 13, 2024 6:22:35 PM

**SECURITY ALERT:** This email is from an external source.

Good evening Eve,

As mentioned in our response to your Motion to Enforce TRO, NBCI has been trying to transition Ms. Grey from admin seg to general population, which would better serve her long term needs. NBCI staff advised us that they believed they found a proper placement in general population for her, but then Ms. Grey made some new claims and allegations of issues with other IIs and stated that she doesn't feel safe in general population. Prior to this, NBCI did not have any record of enemies for Ms. Grey, so they are keeping her on admin seg while they attempt to investigate these safety concerns. But NBCI does currently house transgender incarcerated individuals in general population, so it is feasible to safely house transgender incarcerated individuals in general population at NBCI, and NBCI staff will continue to work towards finding Ms. Grey a proper housing assignment.

Best,

Kelly and Merrilyn

On Wed, Mar 13, 2024 at 1:23 PM Eve Hill <[EHill@browngold.com](mailto:EHill@browngold.com)> wrote:

Dear Merrilyn and Kelly

We just received a call from Chloe Grey indicating that she is being placed in general population in a double cell at NBCI. She was told that she is going to be placed in Housing Unit 2 and be treated "like any other male inmate." As you must know, gang culture would require that any affiliated prisoner harm her immediately. I can't emphasize strongly enough how dangerous such a transfer would be for our client. NBCI is not capable of protecting Ms. Grey in general population. Ms. Grey is already being threatened with rape and killing – threats which will be much easier to carry out in general population with a cellmate. Nor will Ms. Grey be able to continue her social transition in that atmosphere. Such a placement would clearly not be taking Ms. Grey's opinion about her placement into account, as is required by DPSCS' own gender dysphoria policies. Nor does it comport with the basic Eighth Amendment requirement to not be deliberately indifferent to her safety. If general population placement cannot be prevented, which it should be, at the very least NBCI should place Ms. Grey on an honor tier where she will not be surrounded by the most dangerous inmates in the facility.

Please advise. I truly hope this is all a misunderstanding and your client is not really putting Ms. Grey's safety and life at risk.

Best,

Eve

## Eve Hill

Attorney

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Pronouns: she/her/hers

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